

# Charny & Wheeler P.C.

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December 28, 2023

By ECF

Hon. Kenneth M. Karas, U.S.D.J.  
The Hon. Charles L. Briant Jr.  
Federal Building & Courthouse  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: Maria Alves, et al. v. Affiliated Home Care of Putnam, Inc., et al.  
Civil Action No. 7:16-cv-1593 (KMK)

Dear Judge Karas,

This office is co-counsel to Plaintiff's in the above-referenced matter. Currently due tomorrow is the parties' proposed Joint Pretrial Order. In addition, Defendants have filed a motion styled "Motion to Decertify Collective Action and Class Action," which per Your Honor's Individual Rules would require opposition on or before January 2, 2024.

I write on consent of all counsel to adjust the calendar so both of these submissions are due on January 23, 2024.

The reasons for this request are both of these deadlines have snuck up on counsel, the holidays, my service as counsel to the United Auto Workers which has preoccupied my time, my co-counsel's movement to a new firm, Defendants securing successor counsel, and the vagaries of our busy calendars.

Of course, if Your Honor intends to schedule the trial on this matter in a more immediate fashion, we understand that you will adjust this request accordingly.

Thank you for your attention to this request.

Granted.

So Ordered.

12/28/23

Respectfully Submitted:

  
Nathaniel K. Charny

cc: Daniel Stafford, Esq. (by ECF)  
Daniel S. Bretzius, Esq. (by ECF)